

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA  
IN AND FOR THE COUNTY OF SAN FRANCISCO

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SOUTH TAHOE PUBLIC UTILITY	)	
DISTRICT,	)	
	)	
Plaintiff,	)	
	)	
vs	)	No. 999128
	)	
ATLANTIC RICHFIELD COMPANY	)	
("ARCO"); ARCO CHEMICAL COMPANY;	)	
SHELL OIL COMPANY; CHEVRON	)	
U.S.A., INC.; EXXON CORPORATION;	)	
B.P. AMERICA, INC.; TOSCO	)	
CORPORATION; ULTRAMAR, INC.;	)	
BEACON OIL CO.; USA GASOLINE	)	
CORPORATION; SHELL OIL PRODUCTS	)	
CO.; TERRIBLE HERBST, INC.;	)	
ROTTEN ROBBIE; J.E. TVETEN	)	
CORP.; TAHOE TOM'S GAS STATION;	)	
THE SOUTHLAND CORP.; PARADISE	)	
CHEVRON; and DOES 1 through 600,	)	
inclusive,	)	
	)	
Defendants.	)	

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FRIDAY, JANUARY 26, 2001  
9:47 A.M.

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DEPOSITION OF  
SANDRA N. MOHR, M.D., M.P.H.

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1 with that clause as well.

2 "However, estimates of human risk from MTBE  
3 contain large uncertainties in both human exposure and  
4 cancer potency." I actually think we have characterized  
5 fairly well human exposure, there are uncertainties in  
6 cancer potency.

7 Q Why are there uncertainties in cancer potency?

8 A I already said for the record that I agreed that  
9 there had been no studies on the carcinogenicity of MTBE  
10 in humans. And while it does look like MTBE is a rodent  
11 carcinogen, how that's going to translate into potency  
12 for humans remains to be seen.

13 I suspect, like my former boss, that MTBE is not  
14 going to be a major human carcinogen, but the study is  
15 yet to be done.

16 Q Are you currently a consultant to Conoco?

17 A No, I'm not.

18 Q Were you in the past?

19 A Yes.

20 Q Is it your understanding, what is your understanding  
21 of their principal business?

22 A When I was a consultant to Conoco I had just gotten  
23 out of residency and in solo private practice in a town  
24 called Ponca City, Oklahoma.

25 As it turns out, Conoco had a hard time keeping  
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